

**NOTICE OF 30-DAY PERIOD  
FOR PUBLIC COMMENT**

Proposed Approval of a Part 70 Permit

for **Independent Packaging**  
in **Monroe County**

Part 70 No.: T 105-10511-00018

Notice is hereby given that the above-mentioned company, located at 303 N. Curry Pike, Bloomington, Indiana 47404, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Part 70 Permit for the flexographic printing source.

A Part 70 permit consolidates all of a source's applicable air pollution control requirements into one permit. This proposed Part 70 permit includes provisions that ensure that compliance with these requirements can be determined.

This proposed Part 70 permit does not contain any new proposed emission units.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit should or should not be issued. Appropriate comments should be related to any air quality issues, interpretation of the state and federal rules, calculations made, technical issues, or the effect that the operation of this source would have on any aggrieved individuals.

A copy of the application and proposed permit is available for examination at the Monroe County Public Library, 303 E. Kirkwood, Bloomington, Indiana 47404. All statements, along with supporting documentation, should be submitted in writing to the IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If adverse comments concerning the **air pollution impact** of this proposed source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the OAM, at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have fifteen (15) days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to Frank P. Castelli, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

FPC/MES

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Independent Packaging  
303 N. Curry Pike  
Bloomington, Indiana 47404**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 105-10511-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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- D.2.4 Volatile Organic Compounds (VOC)
- D.2.5 Minimum Temperature Requirement for Catalytic Oxidizers
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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary flexographic printing source.

Responsible Official: Jack Culver  
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404  
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404  
Phone Number: 812 - 339 - 9294  
SIC Code: 2759  
County Location: Monroe  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Three (3) flexographic printing presses (#1, #2 and #3), known as EU-001, installed in 1994, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, rated at 2.5 million British thermal units per hour, exhausting through Stack 001, capacity: 43.2 million square inches per hour, each.
- (b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, rated at 2.5 million British thermal units per hour, exhausting through Stack 002, capacity: 43.2 million square inches per hour.
- (c) One (1) fifty (50) inch, eight (8) color flexographic printing press, (press #5), known as EU-003, installed in 1999, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, rated at 0.9 million British thermal units per hour for control of volatile organic compounds, exhausting through Stack 003, capacity: 43.2 million square inches per hour.
- (d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, exhausting through Stack 004, capacity: 455 pounds of ink and solvent per hour.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Eighteen (18) bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day. (326 IAC 6-3-2).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying,

revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
  - (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
    - (1) The applicable requirements are included and specifically identified in this permit; or

- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408 (a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- 
- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
  - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (i) A brief description of the change within the source;
  - (ii) The date on which the change will occur;
  - (iii) Any change in emissions; and
  - (iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-7-6(1)]**

##### **C.8 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

##### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.12 Monitoring Methods [326 IAC 3]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.13 Temperature Gauge Specifications**

Whenever a condition in this permit requires the measurement of temperature of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
within ninety (90) days after the date of issuance of this permit.  
  
The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

**C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM, may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

### **Stratospheric Ozone Protection**

#### **C.22 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) Three (3) flexographic printing presses (#1, #2 and #3), known as EU-001, installed in 1994, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, rated at 2.5 million British thermal units per hour, exhausting through Stack 001, capacity: 43.2 million square inches per hour, each.
- (b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, rated at 2.5 million British thermal units per hour, exhausting through Stack 002, capacity: 43.2 million square inches per hour.
- (d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, exhausting through Stack 004, capacity: 455 pounds of ink and solvent per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5 (Graphic arts operation), the catalytic oxidizers shall operate at all times that EU-001 (presses #1 - #3) and EU-002 (press #4) are in operation. When operating, the catalytic oxidizers shall maintain a minimum operating temperature of 550 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum ninety percent (90%) destruction of the volatile organic compound (VOC) captured.
- (b) When operating the catalytic oxidizers to achieve the limit for rule 326 IAC 8-5-5(e)(3), a capture system must be used at all times in conjunction with the oxidizers to attain an efficiency sufficient to achieve an overall control efficiency (capture and destruction) of sixty (60%) percent for the flexographic printing presses #1 - #4. The overall destruction efficiency and the use of the catalytic oxidizers are required by the rule 326 IAC 8-5-5.

#### D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) EU-001, EU-002 and EU-004 shall emit less than 250 tons of VOC, from coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period as calculated in Condition D.1.2(b). This input limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (b) The input of VOC including cleanup solvents to EU-001 (presses #1 - #3), EU-002 (press #4) and EU-004 (mixing room) based on:
  - (1) An overall VOC control efficiency of sixty-seven and nine tenths (67.9%) percent for EU-001 or that determined by the latest valid compliance demonstration,
  - (2) An overall VOC control efficiency of seventy and five tenths (70.5%) percent for EU-002 or that determined by the latest valid compliance demonstration, and
  - (3) A VOC emission factor of two (2%) percent for mixing losses of the input delivered to the EU-004 or that determined by the latest valid compliance demonstration.

shall be limited by the following equation:

$X * (1 - 0.679) + Y * (1 - 0.705) + 0.02 * Z < 250.0$  tons of VOC per twelve (12) consecutive month period.

where X = VOC input to EU-001,  
Y = VOC input to EU-002, and  
Z = VOC input to EU-004.

- (c) The requirement from the Amendment to CP 105-3447-00018, issued on June 17, 1994, Condition 8 that required the total amount of VOC as contained in the ink and solvent blend, input to the printing presses (#1 - 3) shall not exceed 197.2 tons per 365-day period, rolled on a daily basis is no longer required since the source has agreed to limit the VOC emissions after controls from presses #1 - 4 and the mixing room to less than 250 tons per twelve (12) consecutive month period in order to avoid the applicability of 326 IAC 2-2.

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-001 and EU-002 (Presses #1 - #4) and their control devices and the EU-004 (mixing room).

**Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.4 Volatile Organic Compounds (VOC)**

Compliance with the VOC usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.5 Minimum Temperature Requirement For Catalytic Oxidizer**

When operating, the catalytic oxidizers, known as catalytic oxidizer #1 and #2, shall maintain a minimum temperature of 550 degrees Fahrenheit or the minimum operating temperature determined by the latest stack test that will achieve at least a sixty (60%) percent overall efficiency for each oxidizer.

**D.1.6 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]**

During the period between 12 to 30 months after the issuance of this permit or within two and one half (2½) years of the latest valid compliance demonstration, the Permittee shall perform compliance stack tests for capture and destruction for the catalytic oxidizers #1 and #2 used to achieve compliance with 326 IAC 8-5-5 utilizing methods approved by the commissioner. These stack tests shall be performed at least once every two and one half (2½) years after the last valid compliance demonstration to determine the minimum operating temperature that will achieve at least a sixty (60%) overall efficiency for each of these oxidizers. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facilities are in compliance.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.7 Parametric Monitoring**

A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer #1 and #2 for measuring operating temperature. The output of these systems shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack tests for each catalytic oxidizer. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.8 Record Keeping Requirements**

To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2.

- (1) The VOC content of the inks used for each month;
- (2) The cleanup solvent usage for each month;
- (3) The total VOC usage for each month;
- (4) The weight of VOCs emitted for each compliance period ,and
- (5) The continuous temperature records for the catalytic oxidizers and the temperatures used to demonstrate compliance during the most recent compliance stack test.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.9 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (c) One (1) fifty (50) inch, eight (8) color flexographic printing press, (press #5), known as EU-003, installed in 1999, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, rated at 0.9 million British thermal units per hour for control of volatile organic compounds, exhausting through Stack 003, capacity: 43.2 million square inches per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) Pursuant to 326 IAC 8-5-5 (Graphic arts operation), the catalytic oxidizer shall operate at all times that EU-003 (press #5) is in operation. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 600 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum ninety percent (90%) destruction of the volatile organic compound (VOC) captured.
- (b) When operating the catalytic oxidizer to achieve the limit for rule 326 IAC 8-5-5(e)(3), a capture system must be used at all times in conjunction with the oxidizer to attain an efficiency sufficient to achieve an overall control efficiency (capture and destruction) of sixty (60%) percent for the flexographic printing press #5. The overall destruction efficiency and the use of the catalytic oxidizer is required by the rule 326 IAC 8-5-5.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]

Pursuant to SSM 105-11179, issued November 4, 1999, any change or modification which may increase the VOC input to 625 tons per year or more based on an overall control efficiency of 60% from the flexographic printing press # 5 must be approved by the Office of Air Management (OAM) before such change may occur.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-003 (Press #5) and its control device.

### Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.2.5 Minimum Temperature Requirement For Catalytic Oxidizer

When operating, the catalytic oxidizer, known as catalytic oxidizer #3, shall maintain a minimum temperature of 600 degrees Fahrenheit or the minimum operating temperature determined by the latest stack test that will achieve at least a sixty (60%) percent overall efficiency for the oxidizer.

**D.2.6 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]**

Pursuant to SSM 105-11179 issued November 4, 1999, the Permittee shall perform compliance stack tests by the end of the June 2000 for capture and destruction for the catalytic oxidizer #3 used to achieve compliance with 326 IAC 8-5-5 utilizing methods approved by the commissioner. This stack test shall be performed at least once every two and one half (2½) years after the last valid compliance demonstration to determine the minimum operating temperature that will achieve at least a sixty (60%) overall efficiency for each of these oxidizers. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facilities are in compliance.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.2.7 Parametric Monitoring**

A continuous monitoring system shall be calibrated, maintained, and operated on catalytic oxidizer #3 for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.2.8 Record Keeping Requirements**

To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D. 2.2.

- (1) The VOC content of the inks used for each month;
- (2) The cleanup solvent usage for each month;
- (3) The total VOC usage for each month;
- (4) The weight of VOCs emitted for each compliance period ,and
- (5) The continuous temperature records for the catalytic oxidizers and the temperatures used to demonstrate compliance during the most recent compliance stack test.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

Eighteen (18) bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day. (326 IAC 6-3-2).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the bag folding and cutting machines shall not exceed allowable PM emission rate based on the following equations:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.3.2 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Independent Packaging  
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404  
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404  
Part 70 Permit No.: T 105-10511-00018

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Independent Packaging  
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404  
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404  
Part 70 Permit No.: T 105-10511-00018

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9</b>	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four <b>(4)</b> business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two <b>(2)</b> days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<b>9</b>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten <b>(10)</b> calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Independent Packaging  
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404  
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404  
Part 70 Permit No.: 105-10511-00018  
Facility: EU-001 (Presses #1 - #3), EU-002 (Press #4) and EU-004 (Mixing Room)  
Parameter: Input of VOC  
Limit:  $L = X * (1 - 0.660) + Y * (1 - 0.705) + 0.02 * Z$ , where X = VOC input to EU-001, Y = VOC input to EU-002, and Z = VOC input to EU-004. L must be < 250 tons per twelve (12) consecutive month period.

YEAR: \_\_\_\_\_

Month	Input of VOC (tons) to			L (tons)	L (tons)	L (tons)
	EU-001	EU-002	EU-004	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Independent Packaging  
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404  
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404  
Part 70 Permit No.: 105-10511-00018

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Part 70 Operating Permit**

#### **Source Background and Description**

**Source Name:** Independent Packaging  
**Source Location:** 303 N. Curry Pike, Bloomington, Indiana 47404  
**County:** Monroe  
**SIC Code:** 2759  
**Operation Permit No.:** T 105-10511-00018  
**Permit Reviewer:** Frank P. Castelli

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Independent Packaging relating to the operation of a flexographic printing source.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Three (3) flexographic printing presses (#1, #2 and #3), known as EU-001, installed in 1994, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, rated at 2.5 million British thermal units per hour, exhausting through Stack 001, capacity: 43.2 million square inches per hour, each.
- (b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, rated at 2.5 million British thermal units per hour, exhausting through Stack 002, capacity: 43.2 million square inches per hour.
- (c) One (1) fifty (50) inch, eight (8) color flexographic printing press, (press #5), known as EU-003, installed in 1999, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, rated at 0.9 million British thermal units per hour for control of volatile organic compounds, exhausting through Stack 003, capacity: 43.2 million square inches per hour.
- (d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, exhausting through Stack 004, capacity: 455 pounds of ink and solvent per hour.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### **New Emission Units and Pollution Control Equipment Receiving Prior Approval**

There are no new facilities proposed at this source during this review process.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Other activities or categories not previously identified:
  - (1) Eighteen (18) bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day.
  - (2) Two (2) solvent storage tanks, capacity :4,000 gallons each, VOC less than three (3) pounds per hour or fifteen (15) pounds per day.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 105-3447-00018, issued on June 3, 1994,
- (b) Amendment to CP 105-3447-00018, issued on June 17, 1994,
- (c) CP 105-4805-00018, issued on March 5, 1996,
- (d) Amendment to CP 105-4805-00018, issued on August 11, 1997,
- (e) CP 105-9744-00018, withdrawn July 20, 1998, and
- (f) SSM 105-11179-00018, issued November 4, 1999.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) CP 105-3447-00018, issued on June 3, 1994,

Condition 8: The total amount of VOC as contained in the ink and solvent blend, input to the printing presses (#1 - 3) shall not exceed 156 tons per 365-day period, rolled on a daily basis.

and

- (b) Amendment to CP 105-3447-00018, issued on June 17, 1994,

Condition 8: The total amount of VOC as contained in the ink and solvent blend, input to the printing presses (#1 - 3) shall not exceed 197.2 tons per 365-day period, rolled on a daily basis.

Reason not incorporated: The source has agreed to limit the VOC emission after controls from presses #1 - 4 and the mixing room to less than 250 tons per twelve (12) consecutive month period in order to avoid the applicability of 326 IAC 2-2.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on July 21, 1998. Additional information was received on January 10, 2000.

### Emission Calculations

See pages 1 of 6 of Appendix A of this document for detailed emissions calculations.

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM <sub>10</sub>	0.00
SO <sub>2</sub>	0.00
VOC	3,114
CO	0.00
NO <sub>x</sub>	0.00

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Glycol Ethers	69.3
Dibutylphthate	26.0
TOTAL	95.3

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than one hundred (100) tons per year Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the emission data reported on Forms GSD-07 and GSD-08 since no previous emission data has been received from the source

Pollutant	Actual Emissions (tons/year)
PM	0.240
PM <sub>10</sub>	0.240
SO <sub>2</sub>	0.000
VOC	207
CO	0.420
NO <sub>x</sub>	2.40
Glycol Ethers	2.09
Dibutylthphate	0.810

### Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Presses #1 - 4 & Mixing Room (EU-001 & EU-003)	0.00	0.00	0.00	<250	0.00	0.00	8.69
Press # 5 (EU-004)	0.00	0.00	0.00	216	0.00	0.00	4.27
Insignificant Activities	10.0	10.0	0.250	1.00	2.50	3.00	1.00
Total Emissions	10.0	10.0	0.250	<467	2.50	3.0	14.0

### County Attainment Status

The source is located in Monroe County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Monroe County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) This source is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ because all presses are flexographic and not publication rotogravure printing presses.
- (b) The two (2) solvent storage tanks with a capacity of 4,000 gallons each which are deemed insignificant activities are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, Subparts K, Ka or Kb because both storage tanks have capacities less than 40 cubic meters (10,567 gallons).
- (c) This source or is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart KKK because the source-wide HAPs emissions are controlled and limited to less than ten (10) tons of a single HAP and twenty-five (25) tons per year of the combination of HAPs.

### State Rule Applicability - Entire Source

#### 326 IAC 1-6-3 (Preventive Maintenance Plan)

- (a) Presses #1 - 4 (EU-001 and EU-002) and the mixing room require a preventive maintenance plan because there will be a condition limiting the potential-to-emit to avoid the applicability of 326 IAC 2-2. Presses #1 - 4 also require a PMP because the facilities require control devices to meet the requirements of 326 IAC 8-5-5.
- (b) Press # 5, (EU-004) requires a preventive maintenance plan because the facility requires a control device to meet the requirements of 326 IAC 8-5-5.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

- (a) The source has agreed to limit the VOC emissions from presses #1 - 4 and the ink mixing room to less than 250 tons per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-2. Press # 4 did not have a VOC emission limit pursuant to CP 105-4805-00018, issued March 5, 1996. Presses #1 - 3 have an existing VOC emission limit of 197.2 tons per year pursuant to Amendment to CP 105-3447-00018, issued June 17, 1994. The latest modification to add press #5, SSM 105-11179-00018, issued on November 4, 1999 was a minor modification to an existing minor PSD source. Therefore, the acceptance of the proposed VOC emission limit coupled with the SSM, makes this source an existing major PSD source for any future modifications.
- (b) EU-001, EU-002 and EU-004 shall emit less than 250 tons of VOC, from coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period as calculated by the equation in (c). This input limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (c) The input of VOC including cleanup solvents to EU-001 (presses #1 - #3), EU-002 (press #4) and EU-004 (mixing room) based on:
  - (1) An overall VOC control efficiency of sixty-seven and nine tenths (67.9%) percent for EU-001 or that determined by the latest valid compliance demonstration,
  - (2) An overall VOC control efficiency of seventy and five tenths (70.5%) percent for EU-002 or that determined by the latest valid compliance demonstration, and
  - (3) A VOC emission factor of two (2%) percent for mixing losses of the input delivered to the EU-004 or that determined by the latest valid compliance demonstration.

shall be limited by the following equation:

$$X * (1 - 0.679) + Y * (1 - 0.705) + 0.02 * Z < 250.0 \text{ tons of VOC per twelve (12) consecutive month period.}$$

where X = VOC input to EU-001,  
Y = VOC input to EU-002, and  
Z = VOC input to EU-004.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC in Monroe County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 8-5-5 (Graphic arts operations)**

This rule applies to each of the five (5) flexographic printing presses because they were all constructed after the November 1, 1980 applicability date and they each have a potential to emit greater than twenty-five (25) tons of VOC per year.

Pursuant to 326 IAC 8-5-5, the source shall:

- (a) Operate an incineration system that oxidizes at least 90 percent (90%) of the VOCs captured, and
- (b) A capture system must be used in conjunction with this incineration system such that an overall VOC control efficiency of 60 percent (60%) or greater is achieved.

The five (5) presses are in compliance with this rule since the catalytic oxidizers with capture efficiencies of seventy (70), seventy-one (71) and eighty (80) percent combined with destruction efficiencies of ninety-seven (97), ninety-nine and three tenths (99.3) and ninety-seven (97) percent, for overall control efficiencies of sixty-seven and nine tenths (67.9), seventy and five tenths (70.5) and seventy-seven and six tenths (77.6) percent, respectively, satisfy the requirements of this rule which requires an overall sixty (60) percent control efficiency for each oxidizer.

### **State Rule Applicability - Insignificant Activities**

#### **326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the eighteen (18) bag folding and cutting machines, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this printing source are as follows:

- (a) The catalytic oxidizer for presses #1 -3 (EU-001) has applicable compliance monitoring conditions as specified below:
  - (1) The catalytic oxidizer shall operate at all times that the flexographic printing presses #1 -3, are operated and cleaned. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in the compliance tests to maintain a minimum ninety (90) percent destruction of the volatile organic compounds (VOC) captured.
  - (2) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded.
- (b) The catalytic oxidizer for press #4 (EU-002) has applicable compliance monitoring conditions as specified below:
  - (1) The catalytic oxidizer shall operate at all times that the flexographic printing press #4, is operated and cleaned. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in the compliance tests to maintain a minimum ninety (90) percent destruction of the volatile organic compounds (VOC) captured.
  - (2) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded.
- (c) The catalytic oxidizer for press #5 (EU-004) has applicable compliance monitoring conditions as specified below:
  - (1) The catalytic oxidizer shall operate at all times that the flexographic printing press #5, is operated and cleaned. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 600 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in the compliance tests to maintain a minimum ninety (90) percent destruction of the volatile organic compounds (VOC) captured.
  - (2) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded.

These monitoring conditions are necessary to comply with 326 IAC 8-5-5, 326 IAC 2-2 and 326 IAC 2-7.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations on pages 4 - 6 of 6 of Appendix A.

### **Conclusion**

The operation of this a flexographic printing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 105-10511-00018**.

# Appendix A: Emissions Calculations

Page 1 of 6 TSD App A

VOC From Printing Press Operations  
**Company Name:** Independent Packaging  
**Address City IN Zip:** 303 N. Curry Pike, Bloomington, IN 47404  
**Part 70:** T 105-10511  
**Plt ID:** 105-00018  
**Reviewer:** Frank P. Castelli  
**Date:** July 21, 1998

THROUGHPUT								
Emission Unit	MAXIMUM LINE SPEED	CONVERT FEET TO	MAXIMUM PRINT	60 MIN	8760 HR	1/1000000	MMin^2/YR	MMin^2/HR
EU-001 (Presses #1-3)	FEET PER MINUTE	INCHES	WIDTH INCHES	HOUR	YEAR			
#1 W&H Flexographic	1200	12	50	60	8760	1000000	378432	43.2
#2 W&H Flexographic	1200	12	50	60	8760	1000000	378432	43.2
#3 W&H Flexographic	1200	12	50	60	8760	1000000	378432	43.2

INK VOCS						
Ink Name	Maxium Coverage	Weight % Volatiles	Flash Off %	Through Put	Tons	Tons
EU-001 (Presses #1-3)	lbs/MMin^2			MMin^2/Year	2000 lbs	Year
Worst Case Ink						
#1 W&H Flexographic	1.83	57%	100.00%	378432	2000	197.4
#2 W&H Flexographic	1.83	57%	100.00%	378432	2000	197.4
#3 W&H Flexographic	1.83	57%	100.00%	378432	2000	197.4
Diluent & Clean-up Solvents	Maxium Coverage	Weight % Volatiles	Flash Off %	Through Put	Tons	Tons
Worst Case Solvent (S-215)	lbs/MMin^2			MMin^2/Year	2000 lbs	Year
#1 W&H Flexographic	1.73	100%	100.00%	378432	2000	327.3
#2 W&H Flexographic	1.73	100%	100.00%	378432	2000	327.3
#3 W&H Flexographic	1.73	100%	100.00%	378432	2000	327.3

EU-001	Subtotal	1574	tons/yr
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\*VOC = Maximum Coverage pounds per MMin^2 \* Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

Catalytic oxidizer 70% capture and 97% destruction = 67.9% overall control

	Control Efficiency VOC	Controlled VOC tons/yr	
EU-001	0.679	505	Controlled Emissions
	Subtotal		

Independent Packaging  
Bloomington, Indiana

Page 2 of 6 TSD App A  
T 105-10511-00018

THROUGHPUT								
Emission Unit								
<b>EU-002 (Press #4)</b>	MAXIMUM LINE SPEED	CONVERT FEET TO	MAXIMUM PRINT	60 MIN	8760 HR	1/1000000	MMin^2/YR	MMin^2/HR
	FEET PER MINUTE	INCHES	WIDTH INCHES	HOUR	YEAR			
#4 W&H Flexographic	1200	12	50	60	8760	1000000	378432	43.2

INK VOCS						
Ink Name	Maxium Coverage	Weight % Volatiles	Flash Off %	Through Put	Tons	Tons
Press ID	lbs/MMin^2			MMin^2/Year	2000 lbs	Year
<b>Worst Case Ink</b>						
#4 W&H Flexographic	1.83	57%	100.00%	378432	2000	197.4
Diluent & Clean-up Solvents	Maxium Coverage	Weight % Volatiles	Flash Off %	Through Put	Tons	Tons
<b>Worst Case Solvent (S-215)</b>	lbs/MMin^2			MMin^2/YR	2000 lbs	Year
#4 W&H Flexographic	1.73	100%	100.00%	378432	2000	327.3

<b>Total VOC</b>	<b>525</b>	<b>tons/yr</b>
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\*VOC = Maximum Coverage pounds per MMin^2 \* Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

**Catalytic oxidizer 71% capture and 99.3% destruction = 70.5% overall control**

Control Efficiency	Controlled
VOC	VOC
<b>0.705</b>	tons/yr
	<b>155 Controlled Emissions</b>

METHODOLOGY

Throughput = Maxium line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin^2 per Year  
VOC = Maximum Coverage pounds per MMin^2 \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

THROUGHPUT								
Emission Unit								
<b>EU-004 (Press #5)</b>	MAXIMUM LINE SPEED	CONVERT FEET TO	MAXIMUM PRINT	60 MIN	8760 HR	1/1000000	MMin^2/YR	MMin^2/HR
	FEET PER MINUTE	INCHES	WIDTH INCHES	HOUR	YEAR			
#5 W&H Flexographic	1200	12	50	60	8760	1000000	378432	43.2

INK VOCS						
Ink Name	Maxium Coverage	Weight % Volatiles	Flash Off %	Through Put	Tons	Tons
Press ID	lbs/MMin^2			MMin^2/Year	2000 lbs	Year
<b>Worst Case Ink</b>						
#5 W&H Flexographic	6.1	70%	100.00%	378432	2000	808.0
<b>Solvents 301 or 302</b>	5.1	100%	100.00%	378432	2000	965.0
Cut Ink includes Solvent	5.6	73%	100.00%	378432	2000	773.5

<b>Total VOC</b>	<b>965</b>	<b>tons/yr</b>
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\*VOC = Maximum Coverage pounds per MMin^2 \* Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

**Catalytic oxidizer 80% capture and 97% destruction = 77.6% overall control**

Control Efficiency	Controlled
VOC	VOC
<b>0.776</b>	tons/yr
	<b>216</b>
	<b>Controlled Emissions</b>

**74.1 % Minimum overall efficiency to avoid applicability of 326 IAC 2-2 (250 tons per year)  
for EU-004 (Press 5)**

<b>0.741</b>	tons/yr
	<b>250</b>
	<b>Controlled Emissions</b>

#### METHODOLOGY

Throughput = Maximum line speed feet per minute \* Convert feet to inches \* Maximum print width inches \* 60 minutes per hour \* 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 \* Weight percentage volatiles (water minus organics) \* Flash off \* Throughput \* Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

<b>EU-003 (Ink Mixing Room)</b>	Press #1	Press #2	Press #3	Press #4	Press #5	Presses #1-5	
Inks	692531	692531	692531	692531	692531	3462655	lbs/yr
Solvents	650903	650903	650903	650903	650903	3254515	lbs/yr
						<b>4985842.5</b>	<b>lbs/yr</b>

**50% of inks mixed in mixing room and 100% of solvents mixed in mixing room**

**US EPA AP-42 VOC Emission Factor = 2% For Mixing Losses**

**Potential VOC Emissions**

lbs/yr	tons/yr
<b>99717</b>	<b>49.9</b>

**Limited Input of 91 lbs/hr**

**398.58 tons/year =**

**8.0 tons/yr of VOC**

## HAP Emission Calculations

Company Name: Independent Packaging  
 Address City IN Zip: 303 N. Curry Pike, Bloomington, IN 47404  
 Part 70: T 105-10511  
 Pit ID: 105-00018  
 Reviewer: Frank P. Castelli  
 Date: July 21, 1998

EU-001 (Presses #1-3)      Print rate = 43.2      MM in^2/hr, each

Material Presses: #1-3 W&H Flexographic	Density (lbs/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Dibutylphalate			Glycol Ethers Emissions (tons/yr)	Dibutylphalate Emissions (tons/yr)
<b>Inks</b>										
Slow Dry White #1	11.09	0.165	129.6	1.00	4.00%	0.00%			41.55	0.00
Slow Dry White #2	11.1	0.165	129.6	1.00	4.00%	0.00%			41.59	0.00
Orange Base	7.60	0.241	129.6	1.00	0.00%	1.50%			0.00	15.60
Madras Orange	7.60	0.241	129.6	1.00	0.00%	1.50%			0.00	15.60
Sunshen Red	7.50	0.244	129.6	1.00	0.00%	1.00%			0.00	10.39
Panatone 186	7.70	0.238	129.6	1.00	0.00%	1.00%			0.00	10.40
Rubine Red	7.70	0.238	129.6	1.00	0.00%	1.00%			0.00	10.40
Reflex Blue	7.65	0.239	129.6	1.00	0.00%	1.00%			0.00	10.38
Cyan Blue	7.50	0.244	129.6	1.00	0.00%	1.00%			0.00	10.39
Green	7.60	0.241	129.6	1.00	0.00%	1.00%			0.00	10.40
<b>Subtotal Before Controls</b>					<b>Worst Case ink and solvent subtotal</b>				<b>41.59</b>	<b>15.60</b>

Total State Potential Emissions	<b>Subtotal Worst case ink and solvent Control efficiency = 67.90%</b>	<b>TOTALS:</b>		<b>(tons/yr):</b>	<b>13.3</b>	<b>5.0</b>
				<b>(lbs/hr):</b>	<b>3.05</b>	<b>1.14</b>

## METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs \* Flash-off

EU-002 (Press #4)

Print rate = 43.2 MM in^2/hr

Material Presses: #4 W&H Flexographic	Density (lbs/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Dibutylphalate			Glycol Ethers Emissions (tons/yr)	Dibutylphalate Emissions (tons/yr)
<b>Inks</b>										
Slow Dry White #1	11.09	0.165	43.2	1.00	4.00%	0.00%			13.85	0.00
Slow Dry White #2	11.1	0.165	43.2	1.00	4.00%	0.00%			13.86	0.00
Orange Base	7.60	0.241	43.2	1.00	0.00%	1.50%			0.00	5.20
Madras Orange	7.60	0.241	43.2	1.00	0.00%	1.50%			0.00	5.20
Sunshen Red	7.50	0.244	43.2	1.00	0.00%	1.00%			0.00	3.46
Panatone 186	7.70	0.238	43.2	1.00	0.00%	1.00%			0.00	3.47
Rubine Red	7.70	0.238	43.2	1.00	0.00%	1.00%			0.00	3.47
Reflex Blue	7.65	0.239	43.2	1.00	0.00%	1.00%			0.00	3.46
Cyan Blue	7.50	0.244	43.2	1.00	0.00%	1.00%			0.00	3.46
Green	7.60	0.241	43.2	1.00	0.00%	1.00%			0.00	3.47
<b>Subtotal Before Controls</b>				<b>Worst Case ink and solvent subtotal</b>					<b>13.86</b>	<b>5.20</b>

Total State Potential Emissions	<b>Subtotal Worst case ink and solvent</b>	<b>Control efficiency =</b>	<b>70.50%</b>	<b>After Control</b>		<b>After Control</b>	
				<b>TOTAL:</b>	<b>(tons/yr):</b>	<b>4.09</b>	<b>1.53</b>
					<b>(lbs/hr):</b>	<b>0.93</b>	<b>0.350</b>

EU-004 (Press #5)

Print rate = 43.2 MM in^2/hr

Material Presses: #5 Flexographic	Density (lbs/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Dibutylphalate			Glycol Ethers Emissions (tons/yr)	Dibutylphalate Emissions (tons/yr)
<b>Inks</b>										
Slow Dry White #1	11.09	0.165	43.2	1.00	4.00%	0.00%			13.85	0.00
Slow Dry White #2	11.1	0.165	43.2	1.00	4.00%	0.00%			13.86	0.00
Orange Base	7.60	0.241	43.2	1.00	0.00%	1.50%			0.00	5.20
Madras Orange	7.60	0.241	43.2	1.00	0.00%	1.50%			0.00	5.20
Sunshen Red	7.50	0.244	43.2	1.00	0.00%	1.00%			0.00	3.46
Panatone 186	7.70	0.238	43.2	1.00	0.00%	1.00%			0.00	3.47
Rubine Red	7.70	0.238	43.2	1.00	0.00%	1.00%			0.00	3.47
Reflex Blue	7.65	0.239	43.2	1.00	0.00%	1.00%			0.00	3.46
Cyan Blue	7.50	0.244	43.2	1.00	0.00%	1.00%			0.00	3.46
Green	7.60	0.241	43.2	1.00	0.00%	1.00%			0.00	3.47
<b>Subtotal Before Controls</b>				<b>Worst Case ink and solvent subtotal</b>					<b>13.86</b>	<b>5.20</b>

Total State Potential Emissions	<b>Subtotal Worst case ink and solvent</b>	<b>Control efficiency =</b>	<b>77.60%</b>	<b>After Control</b>		<b>After Control</b>	
				<b>TOTAL:</b>	<b>(tons/yr):</b>	<b>3.11</b>	<b>1.16</b>
					<b>(lbs/hr):</b>	<b>0.71</b>	<b>0.266</b>

Summary

		Before Control	Before Control	After Control	After Control
		Glycol Ethers Emissions (tons/yr)	Dibutylphalate Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Dibutylphalate Emissions (tons/yr)
Press #					
1-3		41.59	15.60	13.35	5.01
4		13.86	5.20	4.09	1.53
5		13.86	5.20	3.11	1.16
<b>Total</b>	<b>Press # 1-5</b>	<b>69.31</b>	<b>25.99</b>	<b>20.54</b>	<b>7.70</b>

Limited by Ratio of Presses 1-4 VOC of  $250/(535+155) = 250/690$  \* each HAP, therefore

Limited and Controlled HAPs for Presses 1-4 are <	6.32	2.37
Total Limited and Controlled HAPS for Presses 1-5 are <	9.42	3.53